

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  BAYOU STEEL BD HOLDINGS, L.L.C., <i>et al.</i> , <sup>1</sup>  Debtors.	Chapter 7  Case No. 19-12153 (KBO)  (Jointly Administered)
GEORGE L. MILLER, in his capacity as Chapter 7 Trustee for the jointly administered bankruptcy estates of Bayou Steel BD Holdings, L.L.C., <i>et al.</i> ,  Plaintiff,  v.  BLACK DIAMOND CAPITAL MANAGEMENT, L.L.C.; BDCM OPPORTUNITY FUND IV, L.P.; BLACK DIAMOND COMMERCIAL FINANCE, L.L.C.; SAM FARAHNAK; PHIL RAYGORODETSKY; ROB ARCHAMBAULT; TERRY TAFT; and BOB UNFRIED,  Defendants.	Adv. Proc. No.: 21-51013 (KBO)  <b>Re: Adv. D.I. 25</b>

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Del. Bankr. L.R. 7007-3, Defendants Rob Archambault, Terry Taft, and Bob Unfried (collectively, the “Independent Directors”), by and through their undersigned counsel, hereby respectfully requests that oral argument be scheduled on the *Independent Directors’ Motion*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783).

*to Dismiss* [Adv. D.I. 25] (the “Motion to Dismiss”). The Motion to Dismiss is fully briefed and ripe for the Court’s consideration. *See*, D.I. 25, 26, 35, 47.

Dated: March 3, 2022  
Wilmington, Delaware

BENESCH, FRIEDLANDER, COPLAN &  
ARONOFF LLP

/s/ Kevin M. Capuzzi

Jennifer R. Hoover (No. 5111)  
Kevin M. Capuzzi (No. 5462)  
1313 North Market Street, Suite 1201  
Wilmington, Delaware 19801  
Telephone: (302) 442-7010  
Email: jhoover@beneschlaw.com

-and-

Sven T. Nylén (admitted *pro hac vice*)  
Jacob H. Marshall (admitted *pro hac vice*)  
71 South Wacker Drive, Suite 1600  
Chicago, Illinois 60606-4637  
Telephone: (312) 212-4949  
Email: snylen@beneschlaw.com

*Counsel to Defendants Rob Archambault, Terry  
Taft, and Bob Unfried*

**CERTIFICATE OF SERVICE**

I, Kevin M. Capuzzi, hereby certify that, on March 3, 2022, a true and correct copy of the foregoing *Request for Oral Argument* was served via CM/ECF on the parties listed below:

PACHULSKI STANG ZIEHL & JONES LLP

Bradford J. Sandler

Colin R. Robinson

Peter J. Keane

919 North Market Street, 17th Floor

P O Box 8705

Tel: 302-652-4100

Fax: 302-652-4400

E-mail: bsandler@pszjlaw.com

crobinson@pszjlaw.com

pkeane@pszjlaw.com

-and-

KAUFMAN, COREN & RESS, P.C.

Steven M. Coren, Esq.

Benjamin M. Mather, Esq.

Janice I. Daul, Esq.

Two Commerce Square

2001 Market Street, Suite 3900

Philadelphia, PA 19103

Tel: 215-735-8700

Fax: 215-735-5170

E-mail: scoren@kcr-law.com

bmath@kcr-law.com

jdaul@kcr-law.com

*Counsel to Chapter 7 Trustee*

Lawrence S. Robbins

William J. Trunk

Jack A. Herman

Leslie C. Esbrook

ROBBINS, RUSSELL, ENGLERT,

ORSECK & UNTEREINER LLP

2000 K Street, N.W., 4th Floor

Washington, D.C. 20006

Tel: (202) 775-4500

Fax: (202) 775-4510

Email: lrobbins@robbinsrussell.com

-and-

ZAIGER LLC

Jeffrey H. Zaiger (admitted *pro hac vice*)

Judd A. Lindenfeld (admitted *pro hac vice*)

2187 Atlantic Street, 9th Floor

Stamford, CT 06902

Tel: (917) 572-7701

Email: jzaiger@zaigerllc.com

-and-

FOX ROTHSCHILD LLP

Seth A. Niederman (DE No. 4588)

919 N. Market Street, Suite 300

Wilmington, DE 19801-3062

Tel.: (302) 654-7444

Fax: (302) 656-8920

Email: sniederman@foxrothschild.com

*Counsel for Defendants Black Diamond  
Capital Management, L.L.C., BDCM  
Opportunity Fund IV, L.P., Black Diamond  
Commercial Finance, L.L.C., Sam  
Farahnak, and Phil Raygorodetsky*

/s/ Kevin M. Capuzzi

Kevin M. Capuzzi (No. 5462)